1	JOHN G. JACOBS (PRO HAC VICE)					
2	BRYAN G. KOLTON (PRO HAC VICE) JACOBS KOLTON, CHTD.					
3	55 West Monroe Street, Suite 2970 Chicago, Illinois 60603					
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5	Facsimile: (312) 268-2425 Email: jgjacobs@jacobskolton.com					
6	bgkolton@jacobskolton.com					
7	Attorneys for Plaintiff Beverly Nunes					
8 9 10	DAVID H. KRAMER, State Bar No. 168452 WILSON SONSINI GOODRICH & ROSATI Professional Corporation 650 Page Mill Road Palo Alto, CA 94304-1050 Telephone: (650) 493-9300 Facsimile: (650) 493-6811 Email: dkramer@wsgr.com					
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13	Attorneys for Defendant Twitter, Inc.					
14	UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA					
15						
SAN FRANCISCO DIVISION						
17	S/II (I III I (O IS C		21/10101/			
18	BEVERLY NUNES, individually and on behalf)	CASE NO.: 14-cv-02843-VC			
19	of a class of similarly situated individuals,)	STIPULATION AND [PROPOSED]			
20	Plaintiff,)	ORDER STAYING PROCEEDINGS AND MODIFYING CASE			
21	V.)	SCHEDULE			
22	TWITTER, INC.,)				
23	Defendant.)				
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28	STIPULATION AND [PROPOSED] ORDER REGARDING STAY AND SCHEDULE CASE NO.: 14-CV-02843-VC					

1	On February 24, 2015, the parties in this matter participated in a mediation with the Hon			
2	Read Ambler, and agreed to further discussions and a further mediation session that is currently			
3	scheduled to be conducted on March 24, 2015. In connection with their ongoing discussions, the			
4	parties have jointly agreed to request a three-month stay of proceedings in this matter, along with			
5	corresponding extensions to the existing case schedule. The parties' agreement and request for a			
6	stay is made in good faith and not for purposes of delay.			
7				
8	THE PARTIES THEREFORE STIPULATE through their undersigned counsel, subjec			
9	to the Court's approval, that:			
10	1. All proceedings in this matter should be stayed through June 2, 2015;			
11	2. The existing case schedule should be modified as follows: Phase I Discovery			
12	completed by September 30, 2015; Initial Expert Witness statements shall be submitted			
13	by October 17, 2015; Rebuttal Expert Witness statements shall be submitted by Novem-			
14	ber 3, 2015; Motions for Summary Judgment on Phase 1 to be heard on February 19			
15	2016 10:00 a.m.			
16				
17	DATE: March 3, 2015	/s/ David H. Kramer		
18		David H. Kramer		
19		WILSON SONSINI GOODRICH & ROSATI		
20		Attorney for Defendant Twitter, Inc.		
21	DATE: March 3, 2015	/s/ John G. Jacobs		
22		John G. Jacobs (<i>PRO HAC VICE</i>) JACOBS KOLTON, CHTD		
23		Jeffrey F. Keller KELLER GROVER, LLP		
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25		Attorneys for Plaintiff Beverly Nunes		
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STIPULATION AND [PROPOSED]
ORDER REGARDING STAY AND SCHEDULE
CASE NO.: 14-CV-02843-VC

-1-

1	PURSUANT TO STIPULATION, AND GOOD CAUSE APPEARING, IT IS HEREBY			
2	ORDERED THAT:			
3	1. All proceedings in this matter are stayed through June 2, 2015;			
4	2. The existing case schedule is modified as follows: Phase I Discovery completed			
5	by September 30, 2015; Initial Expert Witness statements submitted by October			
6	17, 2015; Rebuttal Expert Witness statements submitted by November 3, 2015;			
7	Motions for Summary Judgment on Phase 1 to be heard on February 19, 2016			
8	10:00 a.m.			
9				
10	SIGNED this day of March, 2015.			
11				
12	WINGE CHILLA DINA			
13	VINCE CHHABRIA UNITED STATES DISTRICT JUDGE			
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28 STIPULATION AND [PROPOSED]
ORDER REGARDING STAY AND SCHEDULE
CASE NO.: 14-CV-02843-VC

1	<u>CERTIFICATION</u>			
2	I, David H. Kramer, am the ECF User whose identification and password are being used			
3	to file this STIPULATION AND [PROPOSED] ORDER STAYING PROCEEDINGS AND			
4	MODIFYING CASE SCHEDULE. In compliance with Civil Local Rule 5-1(i), I hereby attest			
5	that John G. Jacobs has concurred in this filing.			
6				
7	DATE: March 3, 2015	/s/ David H. Kramer		
8		David H. Kramer WILSON SONSINI GOODRICH & ROSATI		
9		Professional Corporation 650 Page Mill Road		
10		Palo Alto, CA 94304-1050		
11		Telephone: (650) 493-9300 Facsimile: (650) 493-6811		
12		Email: dkramer@wsgr.com		
13		Attorney for Defendant Twitter, Inc.		
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CERTIFICATION CASE NO.: 14-CV-02843-VC